

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

Case No. 8:20-cv-00862-VMC-TGW

BURTON W. WIAND, as Receiver for
OASIS INTERNATIONAL GROUP, LTD.;
OASIS MANAGEMENT, LLC; AND
SATELLITE HOLDINGS COMPANY,

Plaintiff,

v.

CHRIS AND SHELLEY ARDUINI, et al.,

Defendants.

**DEFENDANT TAMI LACY'S UNOPPOSED MOTION FOR ENLARGEMENT
OF TIME TO RESPOND TO COMPLAINT**

Defendant, TAMI LACY ("Defendant"), by and through undersigned counsel, pursuant to Fed. R. Civ. P. 6 and Local Rule 3.01, M.D. Fla., and this Court's April 28, 2020 Order [D.E. 8], hereby files this *Motion for Enlargement of Time to Respond to the Complaint* ("Motion"), and, in support thereof, states as follows:

1. By this Motion, Defendant seeks an enlargement of time of thirty days within which to respond to Plaintiff's Complaint.
2. Undersigned counsel has just been retained in the instant matter over the weekend, and has been engaged in early settlement discussions with Plaintiff's counsel.
3. The instant Motion is filed before Defendant's response to the Complaint is due.
4. The requested enlargement, if granted, will provide the parties time to continue explore early settlement and disposition of this action, or otherwise allow Defendant sufficient time to prepare a proper response to the Complaint.
5. The enlargement will not prejudice any party, and is not sought for the purpose of

any undue delay. Further, this case is procedurally still in its infancy, there are several motions to dismiss pending, and the case has yet to be set for trial.

6. Pursuant to Local Rule 3.02(g), M.D. Fla., the undersigned certifies that on July 27, 2020, he has conferred via telephone with Plaintiff's counsel, Ms. Alicia Gangi, regarding the relief sought in this Motion, who has indicated that she has no objection to the relief requested therein.

7. Rule 6 of the Federal Rules of Civil Procedure provides that when an act may or must be done within a specified time, the Court, may, for good cause, extend the time if the request is made before the original time expires. Fed. R. Civ. P. 6(b)(1)(A). Defendant respectfully suggest that there is good cause for the requested enlargement. Specifically, the parties are currently engaged in settlement discussions, and the requested enlargement would provide the parties with sufficient time to continue to explore settlement. Defendant, as noted above, makes this request before the expiration of the time for responding to the Complaint.

WHEREFORE, Defendant, TAMI LACY, respectfully requests that this Court enter an Order granting the relief requested in this Motion, enlarging the time for Defendant to respond to Plaintiff's Complaint by a period of thirty days, and awarding any other additional relief as the Court deems just and proper.

Respectfully submitted on this 27th day of July, 2020.

SARDI LAW, PLLC
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By: /s/ Carlos E. Sardi
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served this 27th day of July, 2020 was electronically filed with the Clerk of the Court via CM/ECF, which generates and sends a notice of electronic filing to all counsel of record.

/s/ Carlos E. Sardi

Carlos E. Sardi, Esq.